

ROCKETEER ADVISING!

Rm-9258

From: Terence Lording <eagleshigh@genesisnetwork.net>  
To: A4.A4 (SSEGAL)  
Date: 5/29/98 7:48pm  
Subject: Comments to the Chairman

Terence Lording (eagleshigh@genesisnetwork.net) writes:

Lets lower the bandwidth requirement for broadcasters and allow the small operator to enter the market legally as the founding fathers would intend.

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Server protocol: HTTP/1.1  
Remote host: 208.19.91.154  
Remote IP address: 208.19.91.154

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DOCKET FILE COPY ORIGINAL  
RM-9208

From: Aaron Bishop <pulse@bu.edu>  
To: A4.A4(SSEGAL)  
Date: 5/31/98 12:42am  
Subject: Comments to the Chairman

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Aaron Bishop (pulse@bu.edu) writes:

FEDERAL COMMUNICATIONS COMMISSION  
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Dear Sir,

As I understand it, the reasoning behind the FCC's decision to no longer accept Class D licenses was twofold: first, that the communities could be better served by larger, more powerful stations, and second, that many of the Class D stations of the day were poorly run, managed, and maintained. Often they were broadcasting in a "dirty" manner (i.e. frequency drift, interference to other stations) due to a lack of sufficient backing/resources to maintain quality engineering. And quality programming for that matter.

However, I believe a certain segment of the broadcast industry was shut out in the cold when this decision was handed down: the college radio station. Actually, you could include high-school stations in there as well, but for ease of reference, I shall only refer to them as "college stations".

My reasoning is this: I have either heard of or been a part of a small but noticable contingent of Part 15 college stations that were languishing from a lack of listeners as the listeners couldn't hear the station at all! Or even if they could, they couldn't hear it very well. These stations could benefit greatly from a Class D setup : 10 watts at a fairly low HAAT (say three-five stories off the ground). That would provide decent campus coverage while not muscling in on other, Class A etc. station's signals. Even in a VERY crowded radio market such as mine (Boston, MA), with some cooperation between stations, you could fit a few 10-watt stations in there.

Now, granted, why would anyone want to bother in the first place? Well, these stations are more or less the cornerstone of future radio. After all, isn't a college station's main goal usually to train students to be better radio people? Well, okay, for many stations that's NOT their goal. Hence why I think for some schools this becomes even more necessary...where a school can have a larger, more professional station and also a smaller student-only station for training and serving the campus's needs more directly.

An educational institution also will almost always have the financial and administrative backing to ensure that the station does not fall into disrepair, both engineering-wise and programming-wise, hence circumventing that particular problem with Class D's in the past. If a college (or high school) is going to be serious enough to put up for a station in the first place, they're going to want to make it work. They're not going to sit back and watch it self-destruct; that'd be like throwing money away - something most colleges are loathe to do (on students anyway).

However, the money issue is a double-edged sword; while most colleges would be willing to fund a \$50,000 (or cheaper) venture, they're not willing to pay the \$1-3 million it can easily take to properly set up a Class A or greater station. Hence my request for a partial reinstatement of the Class D license. For the sake of argument, let's call it a "Class E" license. The technical considerations are essentially the same as a Class D...especially an upper power limit of 25 watts (or equivalent), I propose just a few amendments...my hope is that overall there would not be a huge influx of Class E license applications, so these more "special-exceptions" rules could be easily accommodated.

- 1: Educational instutons (colleges & secondary schools) only may apply for Class E licenses
- 2: Religious organizations may not apply for Class E licenses (after all, most of them can afford the Class A's anyway, the point of Class D's is that it's for non-rich but not-poor schools)
- 3: On-air requirements are set to a minimum of 20 hours per week on the air. Schools may file for exceptions during summer and winter break (specific dates and one year's advance notice required)
- 4: EAS receivers (not rebroadcasters) are required.
- 5: Class E's may be commerical or non-commerical. Stations wishing to be considered non-commerical may apply for any frequency of the FM spectrum. If the frequency is within 88.1 to 91.9 MHz, they MUST be non-comm. Non-comm. stations are exempt from licensing fees. Commerical stations are not.
- 6: The primary mission of a Class E station is to serve the campus community and the school's population. Similar in concept and application to a Class A's mission to serve the community in which they broadcast. This rule simply specifies that a Class E's area of broadcast is the campus and that's what they ought to serve.

I hope you take my ideas under consideration, or if that is not feasible, then pass them on to the appropriate party. If you wish to discuss these ideas further I can be reached at this email address, or by my website -

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<http://pulse.home.ml.org>, or by phone at (617) 787-3983.

Thank you very much,

Sincerely,

Aaron Bishop

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Server protocol: HTTP/1.0

Remote host: 204.60.153.56

Remote IP address: 204.60.153.56

**From:** Phil Cohen <pc1@mail.rdu.bellsouth.net>  
**To:** A7.A7(WKENNARD)  
**Date:** 6/1/98 12:31pm  
**Subject:** legalize micro radio

Gentlemen:

I am in full support of legislation to legalize micro radio. This would be in the best interests of our democracy.

Sincerely,

Phil Cohen  
Special Projects Coordinator  
Union of Needletrades, Industrial and  
Textile Employees

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